

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IRON WORKERS' MID-AMERICA	)	
PENSION PLAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 22 C 5334
	)	
PIERINI IRON WORKS, INC.,	)	JUDGE ELAINE E. BUCKLO
an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, PIERINI IRON WORKS, INC., an Illinois corporation, in the total amount of \$517.00, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,202.25.

On December 8, 2022, the Summons and Complaint was served on the corporation's president, Donald G. Pierini (by tendering a copy of said documents to Cheryl Rogowski, Office Manager) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on December 29, 2022. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Rebecca L. Andruzzi

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail and electronic mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 17th day of February 2023:

Mr. Donald G. Pierini, President  
Pierini Iron Works, Inc.  
6450 W. 66<sup>th</sup> Place, Unit B  
Bedford Park, IL 60638-5133  
[david@loftusandcisenberg.com](mailto:david@loftusandcisenberg.com)

/s/ Rebecca L. Andruzzi

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